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May 15, 2013

EMERGENCY MOTION FOR ZOOM HEARING

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**Lewis Brisbois Bisgaard & Smith LLP, §
Plaintiff §**

Civil Action 4:22-cv-3279

**Michael Joseph Bitgood a/k/a “Michael §
Easton,” et al §
Defendants §**

TO THE HONORABLE KEITH ELLISON:

Dear Judge Ellison:

I respectfully request an emergency Zoom hearing today regarding the incapacity of Michael J. Bitgood. Mr. Bitgood is incapacitated, having had surgery on May 9, 2023, to remove six (6) vertebrae and disks (C-3 through C-7 and T-1) and have them replaced with artificial vertebrae and disks. Mr. Bitgood is still in a Houston-area hospital one week post-surgery and his medical team expects him to be incapacitated for sixty (60) days post-surgery to attempt rehabilitation.

Mr. Bitgood cannot volitionally lift his right arm and use his right hand; is unable to walk; his left hand has his left three fingers curled and he cannot straighten them except with great difficulty; he cannot bend his head forward to look at a computer screen, but must hold his phone up to see the screen while lying in a prone position.

Hon. Keith Ellison
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Mr. Bitgood requires assistance to accomplish even the most minimal activities of daily living, including, for example, brushing his teeth. I shall not further describe his other incapacity deficits out of respect for the Court's sensibilities, except to say that he is utterly incapable of doing much more than speaking.

I am immediately requesting a hearing in this case so that the Court can enter the appropriate orders.

Respectfully submitted,

/s/ Susan C. Norman
Susan C. Norman

Certificate of Service

I hereby certify that on the 17th day of May, 2023, I electronically filed the foregoing document with the Clerk of the District Court through the ECF system and an email notice of the electronic filing was sent to all attorneys of record.

/s/ Susan C. Norman
Susan C. Norman, *pro se*